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City and County of San Francisco

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors,

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No.: 19-30088-DM

Chapter 11

**JOINDER OF THE CITY AND  
COUNTY OF SAN FRANCISCO TO  
OBJECTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
TO CORRECTED MOTION OF  
DEBTORS PURSUANT TO 11 USC §  
1121(d) TO EXTEND EXCLUSIVITY  
PERIODS**

DATE: May 22, 2019

TIME: 9:30 am

PLACE: Courtroom 17

450 Golden Gate Avenue, 16<sup>th</sup> Fl.  
San Francisco, California

JUDGE: Hon. Dennis Montali

RELATED DOCKET NOS: 1797, 2017

The City and County of San Francisco ("**San Francisco**") in the above-captioned chapter 11 cases of Pacific Gas and Electric Company (the "**Utility**") and PG&E Corporation ("**PG&E**") and,

1 together with the Utility, the “**Debtors**”), hereby joins, as further described herein, in the Objection of  
2 the Official Committee of Tort Claimants to Corrected Motion of Debtors Pursuant to 11 U.S.C. §  
3 1121(d) to Extend the Exclusivity Periods [Docket # 2017]. (the “**Tort Committee Objection**”).

4 San Francisco generally concurs with the Tort Committee Objection filed herein and believes  
5 that any extension granted by the court should be brief to move this case forward. In support hereof,  
6 San Francisco respectfully represents as follows:

7 **JOINDER**

8 San Francisco’s interest in the Motion is both as a creditor and on behalf of the Utility’s  
9 ratepayers in San Francisco.

10 San Francisco joins the Tort Committee Objection and believes that an extension of six (6)  
11 months to the exclusivity periods as requested by the Debtors is excessive.

12 San Francisco shares concerns stated by the Tort Committee, including those about the  
13 Debtors’ financial condition, reliance on changes to wildfire liability laws as a key component of  
14 reorganization, and seeming inability to affect meaningful change to its corporate culture.

15 San Francisco contends that, if the court is inclined to give the Debtors an extension, the time  
16 period should be for a much shorter period and be geared toward making substantial progress and a  
17 reasonable checkpoint for the Court and creditors to evaluate the Debtors progress. Other  
18 constituents have suggested extension ranging from 75 days (Governor Newsom) to four (4) months  
19 (Unsecured Creditors Committee). San Francisco thinks either would be appropriate at this early  
20 stage to keep the Debtor moving rapidly toward a workable plan for all interested parties.

21 **CONCLUSION**

22 For the reasons stated herein, San Francisco joins in the Tort Committee Objection and  
23 requests that the Court to limit the extension as the Court deems appropriate.

24 Respectfully submitted,

25 Dated: May 20, 2019

GREENE RADOVSKY MALONEY  
SHARE & HENNIGH LLP

27 By: /s/ Edward Tredinnick

28 Edward J. Tredinnick  
Attorneys for Creditor,  
City and County of San Francisco